## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

IN RE:

ACandS, Inc.

Armstrong World Industries, Inc.

Combustion Engineering, Inc.

The Flintkote Company

Kaiser Aluminum Corp.

Owens Corning

US Mineral Products Company

USG Corp.

W.R. Grace & Co.

Debtors

Case No.: 02-12687 (Rel. Dkt. Nos. 3645, 3660)

Case No.: 00-4471 (Rel. Dkt. Nos. 10706, 10721)

Case No.: 03-10495 (Rel. Dkt. Nos. 3386, 3400)

Case No. 04-11300 (Rel. Dkt. Nos. 5643, 5693)

Case No.: 02-10429 (Rel. Dkt. Nos. 10018, 10044)

Case No.: 00-3837 (Rel. Dkt. Nos. 20962, 20981)

Case No. 01-2471 (Rel. Dkt. Nos. 3884, 3897)

Case No. 01-2094 (Rel. Dkt. Nos. 12604, 12617)

Case No. 01-1139 (Rel. Dkt. Nos. 26137, 26357)

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

Mid-Valley, Inc.

North American Refractories Co.

Pittsburgh Corning Corp.

Debtors

Case No.: 03-35592 (Rel. Dkt. Nos. 2775, 2792)

Case No.: 02-20198 (Rel. Dkt. Nos. 6961, 6998)

Case No. 00-22876 (Rel. Dkt. Nos. 8118, 8162)

OBJECTION OF THE LAW OFFICES OF PETER G. ANGELOS, P.C.; BARON & BUDD, P.C.; BRAYTON PURCELL, LLP; HISSEY KIENTZ, LLP; THE LIPMAN LAW FIRM; REAUD, MORGAN & QUINN, INC.; THORNTON & NAUMES, LLP; WATERS & KRAUS, LLP; WEITZ & LUXENBERG P.C.; AND WILLIAMS KHERKHER HART BOUNDAS, LLP, TO GARLOCK'S AMENDED MOTION FOR ORDERS AUTHORIZING ACCESS TO 2019 STATEMENTS AND RELATED RELIEF

The Law Offices of Peter G. Angelos, P.C.; Baron & Budd, P.C.; Brayton Purcell, LLP; Hissey Kientz, LLP; The Lipman Law Firm; Reaud, Morgan & Quinn, Inc.; Thornton & Naumes, LLP; Waters & Kraus, LLP; Weitz & Luxenberg, P.C.; and Williams Kherkher Hart Boundas, LLP (collectively, the "Law Firms" with each being a "Law Firm") hereby file this objection to Garlock's Amended Motion for Order Authorizing Access to 2019 Statements (the "Amended 2019 Motion") and respectfully submit as follows:

On January 10, 2011, Garlock Sealing Technologies ("Garlock") filed its Motion for Order Authorizing Access to 2019 Statements Filed in this Court (the "Original 2019 Motion").

The Law Firms objected to the Original 2019 Motion, filing their Response of the Law Offices of Peter G. Angelos, P.C.; Baron & Budd, P.C.; Brayton Purcell, LLP; Hissey Kientz, LLP; The Lipman Law Firm; Reaud, Morgan & Quinn, Inc.; Thornton & Naumes, LLP; Waters & Kraus, LLP; and Williams Kherkher Hart Boundas, LLP, to the Motion of Garlock Sealing Technologies LLC for Order Authorizing Access to 2019 Statements Filed in this Court and for Related Relief (the "Law Firm Objection").1

At a February 18, 2011 hearing, this Court stated that the filing of the Original 2019 Motion was improper, because, among other reasons, Garlock had not properly sought or been granted relief reopening those of the above captioned bankruptcy cases that have been closed,<sup>2</sup> but the Court entertained argument with respect to those cases that were still pending.

<sup>1</sup> Weitz & Luxenberg P.C. filed a joinder to the Law Firm Objection on March 3, 2011.

<sup>&</sup>lt;sup>2</sup> These "Closed Cases" include ACandS, Inc. Case No.: 02-12687 (JKF); Armstrong World Industries, Inc. Case No.: 00-4471 (JKF); Combustion Engineering, Inc. Case No.: 03-10495 (JKF); Owens Corning Case No.: 00-3837 (JKF); US Mineral Products Company Case No. 01-2471 (JKF); USG Corp. Case No. 01-2094 (JKF); and Mid-Valley, Inc. Case No.: 03-35592 (JKF).

Garlock filed its Amended 2019 Motion in all the above captioned cases on February 28, 2011.

As an initial matter, the Law Firms object to Garlock's filing the Amended 2019 Motion in the Closed Cases, as those cases have not yet been reopened by the Court, and thus Garlock's Amended 2019 Motion is premature and its filing procedurally improper.

To the extent the Court considers the Amended 2019 Motion, the Law Firms hereby incorporate by reference, as if fully set forth herein, the arguments contained and the positions taken in the Law Firm Objection. In addition, the Law Firms hereby incorporate by reference the arguments presented by their counsel at the February 14, 2011 hearing in opposition to the Original 2019 Motion.

For the foregoing reasons, the Law Firms respectfully request that Garlock's Amended 2019 Motion be denied.

Dated: March 15, 2011

/s/ Daniel K. Hogan

Daniel K. Hogan (De. Bar No. 2814)

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